

Paul Sharman

From: Paul Sharman
Sent: Wednesday, July 21, 2021 1:13 PM
To: 'Neal Graham'
Subject: Bryant v McWilliams - Settlement Offer
Attachments: Settlement Agreement - McWilliams.docx

Neal,

Upon further reflection, my client is going to need an indemnification from NS as well. I can't have him testify and then be subject to contribution if your client somehow prevails on the merits. With your permission, I would like to discuss this with Alyssa so that I can get a mutual indemnification between my client and hers prior to the deposition. This is a condition of the settlement between Bryant and McWilliams as well. See attached revised agreement including an additional WHEREAS clause.

Thanks,

Paul

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